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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF MARTIE
KUTSCHER IN SUPPORT OF
FACEBOOK, INC.'S ADMINISTRATIVE
MOTION TO TEMPORARILY FILE
UNDER SEAL**

I, Martie Kutscher, hereby declare as follows:

1. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bars of California, New Jersey, and New York. I submit this declaration in support of Facebook’s Administrative Motion to Temporarily File Under Seal (i) Facebook’s Brief In Opposition To Plaintiffs’ Request For Privileged Investigatory Materials, and (ii) Exhibit A to Facebook’s Brief in Opposition To Plaintiffs’ Request For Privileged Investigatory Materials. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. A true and correct copy of Facebook’s Brief in Opposition to Plaintiffs’ Request For Privileged Investigatory Materials is attached hereto as **Exhibit 1**.

3. A true and correct copy of Exhibit A to Facebook’s Brief in Opposition To Plaintiffs’ Request For Privileged Investigatory Materials—a February 5, 2021 letter from Deborah L. Stein to Derek W. Loeser and Lesley E. Weaver—is attached hereto as **Exhibit 2**.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 5, 2021 in Palo Alto, California.

/s/ Martie Kutscher

Martie Kutscher